



## ARTHUR CARHART NATIONAL WILDERNESS TRAINING CENTER

# MINIMUM REQUIREMENT DECISION GUIDE

*“... except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act.”*

– Wilderness Act, 1964

### **Instructions and worksheets for the Minimum Requirement Analysis for actions, projects, and activities in Wilderness**

The Minimum Requirement Decision Guide (MRDG) is designed for wilderness administrators to effectively analyze proposed actions to minimize negative impacts to wilderness character and values. It assumes a basic knowledge of the Wilderness Act of 1964, agency policies, and specific provisions of the wilderness designation legislation for each unit. This guide is suggested for wilderness administrators for the four federal land management agencies, the Bureau of Land Management, the National Park Service, the U.S. Fish & Wildlife Service and the U.S. Forest Service.

Section 4(c) of the Wilderness Act of 1964 prohibits certain activities in wilderness by the public, and, at the same time allows the agencies to engage in those prohibited activities in some situations. Section 4(c) states:

*“... except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act (including measures required in emergencies involving the health and safety of persons within the area), there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft, no other form of mechanical transport, and no structure or installation within any such area.”*

Therefore, unless a generally prohibited use is allowed by specific unit designation, most of these activities are prohibited. However, in the above language, Congress acknowledged that there are times when exceptions are allowed to meet the minimum required administration of the area as wilderness.

### **How to Use This Guide**

The MRDG displays a two-step process to assist in making the right decision for wilderness. First, the administrator must decide if a problem or issue in the wilderness unit needs administrative action, and then, and only then, the administrator must decide what tool/action/method, available from a range of identified alternatives, would minimize negative impacts on wilderness character and values. This guide includes templates for documenting both steps of the decision-making process, instructions for completing each step, and a cover sheet for signatures. The MRDG and future revised editions of the MRDG can be found on the Arthur Carhart National Wilderness Training Center page at [www.wilderness.net](http://www.wilderness.net).

# STEP 1 – DETERMINING THE MINIMUM REQUIREMENT

## SHEET 1

### Is Administrative Action Needed?

What is the problem/issue that **may** require administrative action? Do not include methods or tools here. This sheet only refers to the issue or problem, not proposed action/project, or tools to be used. Include references from other legislation, policy, or plans, decisions, analyses, and how this issue is addressed in those documents.

Briefly describe the issue/problem: A human-caused fire has started in the Wilderness. Department of Interior Fire Management Policy (620 DM 1), and Service Policy ((095 FW 3) require human-caused fires be suppressed

The following questions assist in analyzing whether the issue needs to be resolved in wilderness. Do not consider what tools are to be used here. Please circle **Yes** or **No**, and explain your reasoning:

1. Is this an emergency? ~~Yes~~ **No** If yes, follow established procedures for Search and rescue (SAR), fire or other plans/policies. If no, please continue.

2. Is this problem/issue subject to valid existing rights, such as access to valid mining claim, state lands, etc? ~~Yes~~ **No**

If no, continue with **Sheet 1**.

If yes, briefly explain here and then proceed to **Sheet 3**

3. Can the problem/issue be addressed by administrative actions outside a wilderness area? (For example, the administrative actions could be an information program at the visitor center or trailhead instead of a physical action in the wilderness, etc) ~~Yes~~ **No**

If yes, conduct actions outside wilderness. If no, continue with **Sheet 2**.

4. Is there a special provision in legislation (the 1964 Wilderness Act or subsequent laws), that allows this project or activity? (For example, maintenance of dams or water storage facilities, access to private inholdings, etc.) **Yes** ~~No~~ **If yes, Go to SHEET 3; if no, Go To SHEET 2.**

## **STEP 1: DETERMINING THE MINIMUM REQUIREMENT (Continued)**

### **SHEET 2**

#### **Is Administrative Action Needed? (Continued)**

The following questions are provided to evaluate whether resolving the issue protects wilderness character and values identified in the Wilderness Act. Answer the questions in terms of the need to resolve the issue/problem. If the answer to most of the questions is yes, then the issue/problem probably requires administrative action. **Please circle Yes or No for each answer, and briefly explain.**

1. If the issue/problem is not resolved, or action is not taken, will the natural processes of the wilderness be adversely affected?

**Yes                      No                      Why/How?**

2. If the issue/problem goes unresolved, or action is not taken, will the values of solitude or primitive and unconfined type of recreation be threatened?

**Yes                      No                      Why/How?**

3. If the issue/problem goes unresolved or action is not taken will evidence of human manipulation, permanent improvements, or human habitation be substantially noticeable ?

**Yes                      No                      Why/How?**

4. Does addressing the issue/problem or taking action protect the wilderness as a whole as opposed to a single resource?

**Yes                      No                      Why/How?**

5. Does addressing this issue/problem or taking action contribute to protection of an enduring resource of wilderness for future generations?

**Yes                      No                      Why/How?**

6. Is this an issue for reasons other than convenience or cost of administration?

**Yes                      No                      Why/How?**

**If administrative action is warranted, then proceed to Sheet 3 to determine the minimum tool or method for resolving the problem.**

## STEP 2: DETERMINING THE MINIMUM TOOL

### SHEET 3: Determining the Minimum Tool: Fill out a Sheet 3 for each alternative.

Identify and describe a range of alternatives including those that utilize traditional tools and non-motorized and mechanized means as well as other methods.

Alternative # 1 - Handtools\_\_\_\_\_

Describe briefly or attach description: Suppression action would be taken by fire crews using handtools to construct firelines, fall snags hazardous to firefighter safety and mop-up burning materials.

#### Circle yes or no:

Does this alternative involve:

use of temporary road?	<del>Yes</del>	No
use of motor vehicles?	<del>Yes</del>	No
use of motorized equipment?	<del>Yes</del>	No
use of motorboats?	<del>Yes</del>	No
landing of airplanes?	<del>Yes</del>	No
landing of helicopters?	<del>Yes</del>	No
use of mechanical transport?	<del>Yes</del>	No
creating a structure or installation?	<del>Yes</del>	No
Other impacts to wilderness character?	<del>Yes</del>	No
Visual impacts_____	Yes	<del>No</del>

**The next set of descriptions may be put on Optional SHEET 3a, if desired:**

**Describe the biophysical effects/benefits of this alternative:** Use of same trail for several days will affect soils, firelines may affect surface water flow. Visual effects of cutting and line construction are potentially significant. Potential value in vegetative changes.

**Describe the social/recreation effects/benefits:** Area is seldom used except during hunting season. No effect either way.

**Describe societal/political effects/benefits:** Possible adverse political effects if action is not sufficient or effective and fire escapes refuge.

**Describe health and safety concerns/benefits:** Distance and terrain to be covered is potential safety hazard to firefighters. Lack of adequate ingress/egress to area potentially life-threatening.

**Describe economic and timing considerations/benefits:** Little effect economically unless incident becomes a campaign. Timing would be a factor only if hunting season occurs simultaneously.

**Describe heritage resource considerations/benefits:** Cultural resource surveys have not been done. Based on drainage and early 20<sup>th</sup> century attempts at farming and disturbance from Walsh Ditch Fire of 1976, there is little likelihood of damages or benefits.

## STEP 2: DETERMINING THE MINIMUM TOOL

### SHEET 3: Determining the Minimum Tool: Fill out a Sheet 3 for each alternative.

Identify and describe a range of alternatives including those that utilize traditional tools and non-motorized and mechanized means as well as other methods.

#### Alternative # 2 - Suppression using Motorized Equipment

Describe briefly or attach description: Suppression operations would use low-ground pressure equipment to transport firefighters and equipment to fire. Possible use of gas engine pumps to wetline fire. Access would follow existing trails or marsh areas to reduce impacts to upland sites.

#### Circle yes or no:

Does this alternative involve:

use of temporary road?	Yes	<del>No</del>
use of motor vehicles?	<del>Yes</del>	No
use of motorized equipment?	Yes	<del>No</del>
use of motorboats?	<del>Yes</del>	No
landing of airplanes?	<del>Yes</del>	No
landing of helicopters?	<del>Yes</del>	No
use of mechanical transport?	Yes	<del>No</del>
creating a structure or installation?	<del>Yes</del>	No
Other impacts to wilderness character?		
Visual impacts, noise _____	Yes	<del>No</del>

**The next set of descriptions may be put on Optional SHEET 3a, if desired:**

**Describe the biophysical effects/benefits of this alternative:** Use of motorized equipment will have potentially significant impacts that can be mitigated some by careful selection of access points. Potential value in vegetative changes.

**Describe the social/recreation effects/benefits:** Area is seldom used except during hunting season. Potential benefit to hunters from increased ease of access.

**Describe societal/political effects/benefits:** Possible adverse political effects if action is not sufficient and fire escapes refuge. Potential political effects from use of equipment in Wilderness.

**Describe health and safety concerns/benefits:** Improved safety margin for firefighters with improved ingress/egress. Some potential for injuries due to proximity of equipment to firefighters.

**Describe economic and timing considerations/benefits:** Little effect economically unless incident becomes a campaign. Timing would be a factor only if hunting season occurs simultaneously.

**Describe heritage resource considerations/benefits:** Cultural resource surveys have not been done. Based on drainage history and early 20<sup>th</sup> century attempts at farming and disturbance from Walsh Ditch Fire of 1976 there is little likelihood of damages or benefits.

## STEP 2: DETERMINING THE MINIMUM TOOL

### SHEET 3: Determining the Minimum Tool: Fill out a Sheet 3 for each alternative.

Identify and describe a range of alternatives including those that utilize traditional tools and non-motorized and mechanized means as well as other methods.

#### Alternative # 3 – Helicopter Water Dropping Operations

Describe briefly or attach description: Use of Helicopter(s) with buckets to drop water on fire areas. This would involve construction/improvement of dipsites outside but adjacent to the Wilderness.

#### Circle yes or no:

Does this alternative involve:

use of temporary road?	<del>Yes</del>	No
use of motor vehicles?	<del>Yes</del>	No
use of motorized equipment?	Yes	<del>No</del>
use of motorboats?	<del>Yes</del>	No
landing of airplanes?	<del>Yes</del>	No
landing of helicopters?	<del>Yes</del>	No
use of mechanical transport?	<del>Yes</del>	No
creating a structure or installation?	<del>Yes</del>	No
Other impacts to wilderness character?		
_Noise from operation_____	Yes	<del>No</del>

**The next set of descriptions may be put on Optional SHEET 3a, if desired:**

**Describe the biophysical effects/benefits of this alternative:** While there is some potential for minor sheet erosion from dumps on bare ground, no chemical additives would be used.

**Describe the social/recreation effects/benefits:** Area is seldom used except during hunting season. No costs or benefits to users under this alternative.

**Describe societal/political effects/benefits:** Possible adverse political effects if action is not sufficient and fire escapes refuge. Potential political effects for use of low-level rotorcraft over Wilderness.

**Describe health and safety concerns/benefits:** Helicopter operations are more dangerous for crewmembers than other alternatives although less personnel are involved. Only Fire effects Monitor would be on the ground in operational area.

**Describe economic and timing considerations/benefits:** Helicopter operations are significantly more expensive than ground operations although quick response has some potential to offset aerial operations cost. Timing is not likely to be a factor except in the immediate fire area and on the flight path if hunting season occurs simultaneously.

**Describe heritage resource considerations/benefits:** Little discernable ground disturbance, little likelihood of damage or benefits.

## STEP 2: DETERMINING THE MINIMUM TOOL

### Sheet 4: Selection of the Minimum Tool Alternative

Attach all alternative sheets to this summary page.

What is the method or tool that will allow the issue/problem to be resolved or an action to be implemented with a minimum of impacts to the wilderness?

The Selected alternative is # 3 Helicopter Water Dropping Operations.

Describe the rationale for selecting this alternative: This alternative has the least impact on natural resources, visibility impacts are temporary during operations, noise impacts are also temporary.

**Describe the specific operating requirements for the action. Include information on timing, locations, type of actions, etc.** Dipsites will be located outside of the Wilderness. Refueling and operational support sites will also be located outside the Wilderness. As this is an emergency operation, there are no timing or other restrictions.

**What are the maintenance requirements?** No post-incident maintenance is required.

**What standards and designs will apply?** Not applicable within Wilderness. External dipsites will take advantage of existing water sources. No chemical additives will be used to protect both dipsites and dumpsites.

Develop and describe any mitigation measures that apply.

**What will be provided for monitoring and feedback to strengthen future effects and preventative actions to be taken to help in future efforts?** Fire effects monitoring will occur, noted adverse effects will be examined to determine mitigations measures for future FMP updates.

#### Approvals:

Prepared by: \_\_\_\_\_ Date: \_\_\_\_\_

Recommended by: \_\_\_\_\_ Date: \_\_\_\_\_

Recommended by: \_\_\_\_\_ Date: \_\_\_\_\_

Approved by: \_\_\_\_\_ Date: \_\_\_\_\_